

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA) Criminal No. 08/223
)
v.) (Judge)
)
MARK KOMOROSKI,)
D&R SPORTS CENTER,)
SERGEY KORZNIKOV, AND)
TACTICA LIMITED)

FILED
HARRISBURG, PA

JUN 4 - 2008

INDICTMENT

MARY E. D'ANDREA, CLERK
Per _____
Deputy Clerk

THE GRAND JURY CHARGES THAT:

Beginning in approximately July, 2004, and continuing through approximately January, 2008, in Columbia County and Luzerne County, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, the defendants, MARK KOMOROSKI, D&R SPORTS CENTER, SERGEY KORZNIKOV, AND TACTICA LIMITED, knowingly and willfully conspired and agreed together and with each other and with other persons known and unknown to the Grand Jury to violate the laws of the United States; to wit, the following statutes and regulations:

1. Title 22, United States Code, Section 2778, and 22 C.F.R. Section 127.1, exporting defense articles from the United States without first having obtained a license or written approval from the Department of State;
2. Title 18, United States Code, Section 554, exporting from the United States merchandise, articles and objects contrary to law;
3. Title 18, United States Code, Section 1341, mail fraud; and
4. Title 18, United States Code, Section 1956, money laundering.

In furtherance of the conspiracy and to effect the objects of the conspiracy, the co-conspirators took the following overt acts, among others:

1. On or about June 23, 2005, D&R Sports Center generated an invoice for Sergey Korznikov and TACTICA for items ordered from D&R Sports Center by TACTICA on that date with a total value \$14,944.07.
2. On or about June 23, 2005, D&R Sports Center generated a second "fake" invoice with a false total value of goods ordered by TACTICA and Sergey Korznikov of \$128.00 and a "ship to" "Mrs. Liudmila Karvetskaya 127 PR-T Vernadskogo Apt 608 117572 Moscow Russia."
3. On or about July 15, 2005, D&R Sports Center M&T Bank Commercial Checking account #98402507 received a wire transfer of \$25,000 USD from Verrex Associates Ltd.
4. On or about November 21, 2005, D&R Sports Center generated an invoice for Sergey Korznikov and TACTICA for items ordered from D&R Sports Center by TACTICA on or about that date with a total value of \$7,955.00.
5. On or about November 21, 2005, D&R Sports Center generated a second "fake" invoice with a false total value of goods ordered by TACTICA and Sergey Korznikov of \$87.00 and a "ship to" "Mr. Artem Avanesian 8/17 Inessy Armand St. Apt. 345 117463 Moscow Russia."
6. On or about December 19, 2005, D&R Sports Center M&T Bank Commercial Checking Account #98402507 received a wire transfer of \$25,000 USD from Langport Solutions.

7. On or about December 16, 2005, D&R Sports Center generated an invoice for Sergey Korznikov and TACTICA for items ordered from D&R Sports Center by TACTICA on or about that date with a total value of \$7,395.03.
8. On or about December 16, 2005, D&R Sports Center generated a second "fake" invoice with a false total value of goods ordered by TACTICA and Sergey Korznikov of \$93.00 and a "ship to" "Mr. Artem Avanesian 8/17 Inessy Armand St. Apt. 345 117463 Moscow Russia."
9. On or about January 11, 2006, D&R Sports Center M&T Bank Commercial Checking Account #98402507 received a wire transfer of \$40,000 USD from Langport Solutions.
10. On or about January 12, 2006, D&R Sports Center generated an invoice for Sergey Korznikov and TACTICA for items ordered from D&R Sports Center by TACTICA on or about that date with a total value of \$6,921.02.
11. On or about January 12, 2006, D&R Sports Center generated a second "fake" invoice with a false total value of goods ordered by TACTICA and Sergey Korznikov of \$93.00 and a "ship to" "Mr. Artem Avanesian 8/17 Inessy Armand St. Apt. 345 117463 Moscow Russia."
12. On or about January 25, 2006, D&R Sports Center M&T Bank Commercial Checking Account #98402507 received a wire transfer of \$140,000 USD from Langport Solutions.
13. On or about June 6, 2006, D&R Sports Center generated an invoice for Sergey Korznikov and TACTICA for items ordered from D&R Sports Center by TACTICA on or about that date with a total value of \$12,181.26.

14. On or about June 6, D&R Sports Center generated a second "fake" invoice with a false total value of goods ordered by TACTICA and Sergey Korznikov of \$94.00 and a "ship to" "Mr. Artem Avanesian 8/17 Inessy Armand St. Apt. 345 117463 Moscow Russia."
15. On or about June 15, 2006, D&R Sports Center M&T Bank Commercial Checking Account #98402507 received a wire transfer of \$50,000 USD from Langport Solutions."
16. On or about August 22, 2006, D&R Sports Center generated an invoice for items ordered from D&R Sports Center by TACTICA and Sergey Korznikov on or about that date with a total value of \$5,962.78. Included in that invoice were Commerce Department export-controlled riflescopes.
17. On or about August 22, 2006, D&R Sports Center generated a second "fake" invoice with a false total value of goods ordered by TACTICA and Sergey Korznikov of \$60.00 and a "ship to" "Mrs. Irina Erastova Litovsky Blvd. 15/5 Apt. 470 117593 Moscow Russia."
18. On or about August 28, 2006, D&R Sports Center M&T Bank Commercial Checking Account #98402507 received a wire transfer of \$40,000 USD from Langport Solutions.
19. On or about December 24, 2007, D&R Sports Center generated an invoice for items ordered from D&R Sports Center by TACTICA on or about that date with a total value of \$35,813.82. Included on the invoice were defense articles; to wit, one TRITA31RCOA4 ACOG 4x32 riflescope; TRITA31F ACOG 4x32 riflescope; and TRITA01NSN ACOG 4x32 riflescope.

20. On or about January 6, 2007, an e-mail was sent from the TACTICA website to an e-mail address for which KOMOROSKI is the subscriber. The e-mail directed "Mark" to split shipments with part of the shipments being directed to "Sergey" and part being directed to "Irina." The e-mail further directed "Mark" that "invoices" should be "about \$250 each." The e-mail was signed by "Sergey."

All in violation of Title 18, United States Code, Section 371.

A TRUE BILL.

[Redacted]
Grand Jury Foreperson

Martin C. Carlson
MARTIN C. CARLSON
United States Attorney

Dated: 6-4-08